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Attorney for defendant Maria Warmbold  
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JL4841

In re	UNITED STATES BANKRUPTCY COURT FOR THE
	DISTRICT OF NEW JERSEY - TRENTON
MARIA E. WARMBOLD,	
	Chapter 7
Debtor	
	Case No. 14-13212/CG
	Adv. Pro. No. 14-01483/CG
TOMLINSON VENTURES, LLC	
	ANSWER
Plaintiff	
-vs-	
MARIA E WARMBOLD	
Defendant	

The defendant, Maria E. Warmbold, through counsel, the Law Firm of Lavery & Sirkis, by way of answering the Complaint of Tomlinson Ventures, LLC does hereby say:

#### **INTRODUCTION**

1. Neither admitted nor denied plaintiff is left to its proofs.
2. Defendant denies the allegations in this paragraph.
3. Defendant denies the allegations in this paragraph.

#### **JURISDICTION AND VENUE**

4. Defendant admits the allegations contained in this paragraph.
5. Defendant admits the allegations contained in this paragraph.
6. Defendant admits the allegations contained in this paragraph.
7. Defendant admits the allegations contained in this paragraph.

**ALLEGATIONS COMMON TO ALL COUNTS**

8. Defendant denies the allegations in this paragraph.
9. Defendant denies the allegations in this paragraph.
10. Defendant denies the allegations in this paragraph.
11. Defendant denies the allegations in this paragraph.
12. Defendant denies the allegations in this paragraph.
13. Neither admitted nor denied plaintiff is left to its proofs.
14. Defendant denies the allegations in this paragraph.
15. Defendant denies the allegations in this paragraph.
16. Defendant denies the allegations in this paragraph.
17. Defendant denies the allegations in this paragraph.
18. Defendant denies the allegations in this paragraph.
19. Defendant denies the allegations in this paragraph.
20. Defendant denies the allegations in this paragraph.
21. Defendant denies the allegations in this paragraph.
22. Neither admitted nor denied plaintiff is left to its proofs.
23. Neither admitted nor denied plaintiff is left to its proofs.
24. Defendant denies the allegations in this paragraph.
25. Neither admitted nor denied plaintiff is left to its proofs.
26. Defendant denies the allegations in this paragraph.
27. Defendant denies the allegations in this paragraph.
28.
  - a. Neither admitted nor denied plaintiff is left to its proofs.
  - b. Defendant denies the allegations in this paragraph.
  - c. Defendant denies the allegations in this paragraph.
  - d. Defendant denies the allegations in this paragraph.
  - e. Defendant denies the allegations in this paragraph.
  - f. Defendant denies the allegations in this paragraph.
29. Defendant denies the allegations in this paragraph.
30. Defendant denies the allegations in this paragraph.
31. Neither admitted nor denied plaintiff is left to its proofs.
32. Neither admitted.
33. Defendant denies the allegations in this paragraph.
34. Defendant denies the allegations in this paragraph.
35. Neither admitted nor denied plaintiff is left to its proofs.
36. Neither admitted nor denied plaintiff is left to its proofs.
37. Defendant denies the allegations in this paragraph.
38. Neither admitted nor denied plaintiff is left to its proofs.
39. Defendant denies the allegations in this paragraph.
40. Defendant denies the allegations in this paragraph.
41. Defendant denies the allegations in this paragraph.

- 42. Defendant denies the allegations in this paragraph.
- 43. Neither admitted nor denied plaintiff is left to its proofs.
- 44. Defendant denies the allegations in this paragraph.
- 45. Defendant denies the allegations in this paragraph.
- 46. Defendant denies the allegations in this paragraph.
- 47. Defendant denies the allegations in this paragraph.
- 48. Neither admitted nor denied plaintiff is left to its proofs.
- 49. Defendant denies the allegations in this paragraph.
- 50. Defendant denies the allegations in this paragraph.
- 51. Defendant denies the allegations in this paragraph.
- 52. Defendant denies the allegations in this paragraph.
- 53. Neither admitted nor denied plaintiff is left to its proofs.
- 54. Defendant denies the allegations in this paragraph.

**FIRST COUNT**

**OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a) 4(A) AND (B) FOR MAKING A FALSE OATH OR ACCOUNT AND/OR FOR PRESENTING A FALSE CLAIM**

- 55. Neither admitted nor denied plaintiff is left to its proofs.
- 56. Defendant admits the allegations contained in this paragraph.
- 57. Defendant admits the allegations contained in this paragraph.
- 58. Defendant denies the allegations in this paragraph.
- 59. Neither admitted nor denied plaintiff is left to its proofs.
- 60. Defendant denies the allegations in this paragraph.
- 61. Defendant denies the allegations in this paragraph.

**SECOND COUNT**

**OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(2) FOR THE TRANSFER AND CONCEALMENT OF PROPERTY WITH INTENT TO DEFRAUD CREDITORS**

- 62. Neither admitted nor denied plaintiff is left to its proofs.
- 63. Neither admitted nor denied plaintiff is left to its proofs.
- 64. Defendant denies the allegations in this paragraph.
- 65. Defendant denies the allegations in this paragraph.

**THIRD COUNT**

**OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(3) FOR FAILING TO KEEP OR PRESERVE RECORDS**

- 66. Neither admitted nor denied plaintiff is left to its proofs.
- 67. Neither admitted nor denied plaintiff is left to its proofs.

68. Defendant denies the allegations in this paragraph.

69. Defendant denies the allegations in this paragraph.

**FOURTH COUNT**

**OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(4) FOR WITHHOLDING RECORDS**

70. Neither admitted.

71. Defendant denies the allegations in this paragraph.

72. Defendant denies the allegations in this paragraph.

73. Defendant denies the allegations in this paragraph.

Wherefore it is respectfully requested that the Plaintiffs Complaint be dismissed.

June 24, 2014

/s/ Joan Sirkis Lavery

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